

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 47, 94, 233, 409 & 410

NOTICE OF REVISED PROPOSED ORDERS

PLEASE TAKE NOTICE that on November 11, 2022 and November 14, 2022, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that on November 19, 2022, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Operate A Postpetition Cash Management System, (B) Maintain Existing Business Forms and (C) Perform Intercompany Transactions, (II) Granting a Partial Waiver of the Deposit Guidelines Set Forth in Section 345(B) and (III) Granting Certain Related Relief* [D.I. 47]. On January 8, 2023, the Debtors filed the *Debtors’ Reply in Support of Motion of Debtors for Entry of a Final Order (I) Authorizing the Debtors to (A) Operate a Postpetition Cash Management System, (B) Maintain Existing Business Forms, and (C) Perform Intercompany Transactions, (II) Granting A Partial Waiver of Deposit Guidelines Set Forth in Section 345(B), and (III) Granting Certain Related Relief* [D.I. 409] (the “Cash Management Reply”). The Debtors have revised the proposed form of final order attached to the Cash Management Reply (the “Revised Final Cash Management Order”), a copy of which is attached hereto as **Exhibit A-1**. A copy of the Revised Final Cash Management Order compared against the proposed final order attached to the Cash Management Reply is attached hereto as **Exhibit A-2**.

PLEASE TAKE FURTHER NOTICE that on November 22, 2022, the Debtors filed the *Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors, In Their Sole Discretion, to Provide Indemnification and Exculpation to Certain Individuals, (B) Authorizing Certain Actions Pursuant to Section 363 of the Bankruptcy Code, and (C) Granting Certain Related Relief* [D.I. 94] (the “Indemnification Motion”). The Debtors have revised the proposed form of final order attached to the Indemnification Motion (the “Revised Final Indemnification Order”), a copy of which is attached hereto as **Exhibit B-1**. A copy of the Revised Final

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

Indemnification Order compared against the proposed final order attached to the Indemnification Motion is attached hereto as **Exhibit B-2**.

PLEASE TAKE FURTHER NOTICE that on December 15, 2022, the Debtors filed the *Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of the Certain Businesses; (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s) and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases* [D.I. 233]. On January 8, 2023, the Debtors filed the *Debtors' Reply in Support of Motion of Debtors for Entry of Orders (I)(A) Approving Bid Procedures, Stalking Horse Protections and the Form and Manner of Notices for the Sale of Certain Businesses, (B) Approving Assumption and Assignment Procedures and (C) Scheduling Auction(s) and Sale Hearing(s), and (II)(A) Approving the Sale(s) Free and Clear of Liens, Claims, Interests and Encumbrances and (B) Authorizing Assumption and Assignment of Executory Contracts and Unexpired Leases* [D.I. 410] (the “Bid Procedures Reply”). The Debtors have revised the proposed form of order attached to the Bid Procedures Reply (the “Revised Bid Procedures Order”), a copy of which is attached hereto as **Exhibit C-1**. A copy of the Revised Bid Procedures Order compared against the proposed order attached to the Bid Procedures Reply is attached hereto as **Exhibit C-2**.

PLEASE TAKE FURTHER NOTICE that copies of all above mentioned motions may be obtained from the Court’s website, <https://ecf.deb.uscourts.gov/>, for a nominal fee, or obtained free of charge by accessing the website of the Debtors’ claims and noticing agent, <https://cases.ra.kroll.com/FTX>.

Dated: January 11, 2023
Wilmington, Delaware

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